

REMARKS

The following remarks are fully and completely responsive to the Office Action dated February 8, 2005. Claims 10-22 are pending in this application. In the outstanding Office Action, claim 10 was rejected under 35 U.S.C. § 102(e) and claims 11-22 were rejected under 35 U.S.C. § 103(a). No new matter has been added. Claims 10-22 are presented for reconsideration.

35 U.S.C. § 102(e)

Claim 10 was rejected under 35 U.S.C. § 102(e), as being anticipated by U.S. Patent No. 6,328,570 to Ng. In making this rejection, the Office Action asserts that this reference teaches each element of the claimed invention. Applicants respectfully traverse this rejection.

Claim 10 recites in part:

providing a memory cartridge storing at least one
karaoke program and at least one game program;
**determining whether the memory cartridge is
attached to a main body of a karaoke apparatus or to the
main body of a gaming apparatus.**

Thus, the method described in Applicants' independent claim 1 determines whether the memory cartridge is attached to the karaoke apparatus or the gaming apparatus. See, e.g., Appl'n, Page 19, Lines 21-24.

In contrast, Ng describes karaoke unit 100 that comprises a removable storage interface 130 that allows a cartridge 135 to be inserted into karaoke unit 100. See, e.g., Ng, Column 3, Lines 35-37. Cartridge 135 may store song data, lyrics, timing information, graphic image data, and game programs. See, e.g., Id. at Lines 40-42.

However, because karaoke unit 100 only includes a **single** storage interface, karaoke unit 100 does not determine “whether the memory cartridge is attached to a main body of a karaoke apparatus or to the main body of a gaming apparatus,” as set forth in Applicants’ independent claim 10.

While Ng suggests that it is possible to incorporate program data, such as a game program, in addition to the so-called karaoke data in the cartridge, Ng fails to disclose that it is possible to simultaneously store a plurality of programs in the single cartridge. In Ng, whether the program stored in the cartridge is to be executed is determined according to the user’s selection in the menu screen. However, only the execution of the single program stored in the cartridge can be instructed in the menu screen as disclosed in the description of the specification and the drawings. Thus, Applicants submit that Ng fails to disclose that a program out of a plurality of programs is selectable and executable.

Furthermore, Ng teaches selecting the program stored in the cartridge using a menu screen. In contrast, the present invention is entirely different from Ng because the determination of which one of a plurality of programs stored in the cartridge is to be executed in the present invention is performed by inserting the cartridge into one of a plurality of main bodies.

In addition, Ng does not disclose that the cartridge is insertable to a plurality of main bodies such as a karaoke apparatus and a game apparatus.

Consequently, Ng fails to teach and/or suggest the claimed invention. Specifically, Ng fails to teach and/or suggest at least providing a memory cartridge storing at least one karaoke program and at least one game program. This reference

also fails to teach and/or suggest at least determining whether the memory cartridge is attached to a main body of a karaoke apparatus or to the main body of a gaming apparatus. Therefore, Applicants request reconsideration and withdrawal of the rejection of claim 10 under 35 U.S.C. § 102(e).

35 U.S.C. § 103(a)

Claims 11-22 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Ng. In making this rejection, the Office Action asserts that this reference teaches and/or suggests the claimed invention. Applicants respectfully traverse this rejection.

a. Independent Claim 20

Claim 20 recites in part:

a system for executing a program stored on a memory cartridge, the memory cartridge storing at least one karaoke program and at least one game program, comprising:

means for **determining whether** the memory cartridge is **attached to a main body of a karaoke apparatus or to the main body of a gaming apparatus.**

In contrast Ng describes karaoke unit 100 that comprises a removable storage interface 130 that allows a cartridge 135 to be inserted into karaoke unit 100. See, e.g., Ng, Column 3, Lines 35-37. Cartridge 135 may store song data, lyrics, timing information, graphic image data, and game programs. See, e.g., Id. at Lines 40-42. However, because karaoke unit 100 only includes a single storage interface, karaoke unit 100 does not include “means for determining whether the memory cartridge is attached to a main body of a karaoke apparatus or to the main body of a gaming apparatus,” as set forth in Applicants’ independent claim 20.

While Ng suggests that it is possible to incorporate program data, such as a game program, in addition to the so-called karaoke data in the cartridge, Ng fails to disclose that it is possible to simultaneously store a plurality of programs in the single cartridge. In Ng, whether the program stored in the cartridge is to be executed is determined according to the user's selection in the menu screen. However, only the execution of the single program stored in the cartridge can be instructed in the menu screen as disclosed in the description of the specification and the drawings. Thus, Applicants submit that Ng fails to disclose that a program out of a plurality of programs is selectable and executable.

Furthermore, Ng teaches selecting the program stored in the cartridge using a menu screen. In contrast, the present invention is entirely different from Ng because the determination of which one of a plurality of programs stored in the cartridge is to be executed in the present invention is performed by inserting the cartridge into one of a plurality of main bodies.

In addition, Ng does not disclose that the cartridge is insertable to a plurality of main bodies such as a karaoke apparatus and a game apparatus.

Consequently, Ng fails to teach and/or suggest the claimed invention. Specifically, Ng fails to teach and/or suggest at least means for determining whether the memory cartridge is attached to a main body of a karaoke apparatus or to the main body of a gaming apparatus. Therefore, Applicants request reconsideration and withdrawal of the rejection of claim 20 under 35 U.S.C. § 103(a).

b. Independent Claims 18, 19, 21, and 22

Claim 18 recites in part:

...if a memory cartridge is **not attached** to the main body of the karaoke apparatus, **selecting a warning message program** stored in the main body of the karaoke apparatus.

Claim 19 recites in part:

...if a memory cartridge is not attached to the main body of the gaming apparatus, selecting a warning message program stored in the main body of the gaming apparatus;

Claim 21 recites in part:

...means for selecting a warning message program stored in the main body of the karaoke apparatus if a memory cartridge is not attached to the main body of the karaoke apparatus;

Claim 22 recites in part:

...means for selecting a warning message program stored in the main body of the gaming apparatus, if a memory cartridge is not attached to the main body of the gaming apparatus;

The Office Action asserts that Ng discloses selecting a warning signal message program when the memory cartridge is not attached to the main body of the karaoke apparatus or when the memory cartridge is not attached to the main body of the gaming apparatus. Specifically, the Office Action asserts that “Ng teaches the determination of whether or not a cartridge is legal (step 620),” and “the displaying of illegal information is considered equivalent to the displaying of a ‘warning message’ [in Applicants’ claimed invention].” Office Action, Page 5, Lines 3, 17, and 18. Applicants respectfully disagree.

For example, Ng states:

In step 620, the processor determines whether the download operation is legal or not. A download operation is not legal if, for example, cartridge 135 is not a compatible cartridge, identification information stored on cartridge 135 is invalid, or cartridge 135 is write protected or is a read-only type memory storage medium. If it is not legal, then in step 630, karaoke unit 100 displays information about the illegal operation and the routine ends.

Thus, in Ng, the only time a karaoke unit 100 displays “illegal information” is when cartridge 135 is **inserted inside** karaoke unit 100. In contrast, in Applicants’ claimed invention as set forth in independent claims 18, 19, 21, and 22, the claimed “warning signal” is selected when the cartridge is **not** attached to the main body of the karaoke apparatus and/or the main body of the gaming apparatus. As such, Applicants’ claimed “warning signal” and the “illegal information” described in Ng cannot be equivalents because the “illegal information” described in Ng is only displayed when the cartridge is attached to the karaoke unit and the “illegal information” is not displayed when the cartridge is removed or not attached to the karaoke unit.

Regarding claims 18, 19, 21 and 22, in the karaoke apparatus according to the present invention, the program which indicates the warning message is physically located in the boot area of the processor in case no cartridge is loaded or inserted into the main body, and therefore, irrespective of whether the cartridge is authentic or not, the program is executed only when the cartridge is not inserted into the main body. Therefore, the present invention is different from Ng in which the warning message is indicated only when the cartridge inserted is not an authentic one.

Consequently, Ng fails to teach and/or suggest the claimed invention. Regarding claim 18, Ng fails to teach and/or suggest that if a memory cartridge is not attached to the main body of the karaoke apparatus, selecting a warning message program stored

in the main body of the karaoke apparatus. Regarding claim 19, Ng fails to teach and/or suggest that if the memory cartridge is not attached to the main body of the gaming apparatus, selecting a warning message program stored in the main body of the gaming apparatus. Regarding claim 21, Ng fails to teach and/or suggest the function of selecting a warning message program stored in the main body of the karaoke apparatus if a memory cartridge is not attached to the main body of the karaoke apparatus. Therefore, Ng fails to teach and/or suggest the means for selecting a warning message program stored in the main body of the karaoke apparatus if a memory cartridge is not attached to the main body of the karaoke apparatus. Regarding claim 22, Ng fails to teach and/or suggest the function of selecting a warning message program stored in the main body of the gaming apparatus, if a memory cartridge is not attached to the main body of the gaming apparatus. Therefore, Ng fails to teach and/or suggest means for selecting a warning message program stored in the main body of the gaming apparatus, if a memory cartridge is not attached to the main body of the gaming apparatus. Therefore, Applicants request reconsideration and withdrawal of the rejection of claims 18, 19, 21 and 22 under 35 U.S.C. § 103(a).

c. Dependent Claims 11-17

Because claims 11-17 depend from allowable independent claim 10, Applicants submit that these claims are allowable at least for this reason.

Conclusion

Applicants' remarks have overcome the rejections set forth in the Office Action dated February 8, 2005. Specifically, Applicants' remarks have distinguished claim 10 from Ng and thus overcome the rejection of this claim under 35 U.S.C. § 102(e). Applicants' remarks have also distinguished claims 11-22 from Ng and thus overcome

the rejection of these claims under 35 U.S.C. § 103(a). Accordingly, claims 10-22 are in condition for allowance. Therefore, Applicants respectfully request consideration and allowance of claims 10-22.

Applicants submit that the application is now in condition for allowance. If the Examiner believes the application is not in condition for allowance, Applicants respectfully request that the Examiner contact the undersigned attorney by telephone if it is believed that such contact will expedite the prosecution of the application.

In the event that this paper is not considered to be timely filed, Applicants respectfully petition for an appropriate extension of time.

The Commissioner is authorized to charge payment for any additional fees which may be required with respect to this paper to our Deposit Account No. 01-2300, making reference to attorney docket number 100341-00017.

Respectfully submitted,
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